

Therefore, IBM respectfully requests that the Court grant this Unopposed Motion and permit IBM until July 12, 2018 to answer or otherwise respond.

Dated: June 18, 2018

Respectfully submitted,

/s/ Brian M. Jorgensen

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**Motion for Admission Pro Hac Vice
forthcoming*

*Attorneys for Defendant
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CERTIFICATE OF CONFERENCE

Counsel for Defendant has complied with the Court's meet and confer requirement. On June 15, 2018, IBM Counsel conferred via email with Heidi Coughlin regarding the extension sought in this Motion. Counsel responded that Plaintiff is not opposed to the relief sought in this Motion.

/s/ Brian M. Jorgensen
Brian M. Jorgensen

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2018, I electronically filed the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of Court using the CM/ECF system, which sent notification of such filing to the Court and Plaintiff's counsel.

/s/ Brian M. Jorgensen
Brian M. Jorgensen